

Magistrate Judge Theresa L. Fricke

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

UNITED STATES OF AMERICA,
Plaintiff,
v.
MATAN L. GOODMAN,
Defendant.

CASE NO. MJ23-5363 TLF
COMPLAINT for VIOLATION
Title 18 U.S.C § 2251(a), (e).

16 Before the Honorable Theresa L. Fricke, United States Magistrate Judge, United
17 States Courthouse, Tacoma, Washington.

18 The undersigned complainant being duly sworn states:

19 **COUNT ONE**

20 **(Production of Child Pornography)**

21 Between in or about January 2022 and in or about March 2023, in Jefferson
22 County, within the Western District of Washington and elsewhere, MATAN L.
23 GOODMAN employed, used, persuaded, induced, enticed, and coerced a minor to
24 engage in sexually explicit conduct for the purpose of producing a visual depiction of
25 such conduct and transmitting any live visual depiction of such conduct, and attempted to
26 do so, knowing and having reason to know that such visual depiction would be
27 transported and transmitted using any means or facility of interstate and foreign

1 commerce, such visual depiction was transported and transmitted using any means or
2 facility of interstate and foreign commerce and in and affecting interstate and foreign
3 commerce, and such visual depiction was produced using materials that had been mailed,
4 shipped, and transported in interstate and foreign commerce.

5 All in violation of Title 18, United States Code, Section 2251(a), (e).

6
7 And the complainant states that this Complaint is based on the following
8 information:

9 I, Special Agent Daniel A. Orlando, being duly sworn under oath, depose and say:

10 **INTRODUCTION**

11 1. I have been a Special Agent (SA) with Homeland Security Investigations
12 (HSI) since November 2022. As an HSI SA, I am an "Investigator or Law Enforcement
13 Officer" of the United States within the meaning of 18 U.S.C. § 2510(7), that is, an
14 officer of the United States empowered by law to conduct investigations and make arrests
15 for offenses enumerated in 18 U.S.C. § 2516(1). I am currently assigned to the HSI
16 Resident Agent in Charge (RAC) Tacoma Office. Prior to my commission as a SA with
17 HSI, I was a Task Force Officer (TFO) with the Federal Bureau of Investigation (FBI)
18 and served in that capacity since April 2019. During my tenure with the FBI, I
19 investigated criminal enterprises, narcotics, violent crime, and gang activity. Aside from
20 my commission as an FBI TFO, I was employed as a Detective with the Orange County
21 Sheriff's Office (OCSO) in Orlando, Florida, and had been employed with the agency
22 since 2009. I have participated as a case agent, co-case agent, undercover, and
23 investigative agent in gang related, violent crime, narcotics, and other investigations. I
24 have also been the affiant on numerous arrest warrants, search warrants, and court orders
25 at the Federal and State level. Over the last approximately 14 years as a sworn law
26 enforcement officer, I have received extensive training and experience concerning
27 investigations of federal and state violations of law. In connection with my duties and

responsibilities as a FBI TFO and Detective, I have testified in federal and state judicial proceedings and prosecutions for violations of federal and state law. As an HSI Special Agent, I have received extensive training in a variety of investigative and legal matters of violations of federal and state law. I have participated in numerous Child Exploitation investigations as the primary investigator or in a subsidiary role. I have received training in the area of child sexual abuse material (CSAM) and child exploitation and have had the opportunity to observe and review numerous examples of child pornography (as defined in 18 U.S.C. § 2256) in all forms of media including computer media. Moreover, I am a federal law enforcement officer who is engaged in enforcing the criminal laws, including 18 U.S.C. §§ 2251, 2252, and 2252A, and I am authorized by law to request a search warrant.

2. The facts set forth in this Complaint are based on my own personal knowledge; knowledge obtained from other individuals during my participation in this investigation, including other law enforcement officers; review of documents and records related to this investigation; communications with others who have personal knowledge of the events and circumstances described herein; and information gained through my training and experience. I have not set forth all facts known to me as a result of this investigation but only those facts I believe necessary to establish probable cause to conclude that MATAN L. GOODMAN committed the offense charged in this Complaint.

SUMMARY OF THE INVESTIGATION

3. As described below, I believe that MATAN L. GOODMAN sexually abused M1, an identified minor under the age of 3, and filmed that abuse. My investigation has revealed that GOODMAN knows M1 and regularly had unsupervised access to and caretaking responsibilities for M1 during the period of this abuse.

4. This investigation arose from a report by Kik Messenger (Kik) concerning suspected Child Sexual Abuse Material (CSAM) uploaded to its servers by one of its users. Kik is an internet-based messaging platform accessed primarily via an application available

1 to users of smartphones and tablets. Kik allows users to participate in one-on-one and group
2 chats and share images and videos with one another. While Kik has numerous legitimate
3 uses, it is also a platform commonly used by offenders to trade CSAM and discuss child
4 sexual abuse.

5 5. In May 2023, Kik reported to the National Center for Missing and Exploited
6 Children (NCMEC) via CyberTipline Report 161968916 that one of its users (the
7 SUBJECT USER) had uploaded suspected child sexual abuse imagery to its server(s). This
8 tip included the username of the account user and an associated Google email address.
9 The report indicated that all uploaded content provided with the CyberTipline report had
10 been viewed in its entirety by Kik Messenger.

11 6. In October 2023, I received and reviewed this report. Included with the
12 CyberTipLine report, NCMEC provided imagery uploaded by the SUBJECT USER to Kik
13 Messenger servers. Kik advised that these images/videos were uploaded to their server(s)
14 between February 18, and March 24, 2023. The NCMEC report included 22 reported files.
15 The report classified 12 as “Apparent Child Pornography” with nine (9) files categorized
16 as “Egregious” due to the imagery being of an infant/toddler (M1). These classifications
17 were determined and reported by NCMEC. NCMEC further advised that the reported file
18 appeared to be “UNFAMILIAR” to NCMEC and possibly “NEWLY PRODUCED and/or
19 “HOMEMADE.”

20 7. I reviewed these files and describe several below. It appears that all of the
21 photos described below (as well as others uploaded by the SUBJECT USER) were taken
22 in the same bathroom and depict the same minor, M1.

- 23 • Image file: 929947f0-9a8e-4a8a-895a-fbe372844e37.jpg (Uploaded to Kik
24 by the SUBJECT USER on February 23, 2023, at 6:28:23 PM UTC Time) –
25 This image is of M1 during what appears to be bath time. M1’s face is
26 partially visible. A white adult male’s partially erect penis is inserted in M1’s
27 mouth. The adult male is holding his penis with his left hand.

- 1 • Image file: e508f334-20c0-4c1b-8e0d-483d66d09ff9.jpg (Uploaded to Kik
2 by the SUBJECT USER on February 23, 2023, at 6:28:26 PM UTC Time) –
3 This image depicts M1 in the same bathroom. M1’s face is partially visible,
4 and M1’s genitalia are visible in the frame. M1 is seated between the legs of
5 a white adult male and touching the adult male’s partially erect penis with
6 M1’s right hand. The adult male is also touching his partially erect penis with
7 his left hand.
- 8 • Image file: b06bea45-cd7f-4138-ace7-b0e61c90f4f0.jpg (Uploaded to Kik
9 by the SUBJECT USER on March 22, 2023, at 5:25:39 PM UTC Time) –
10 This image again shows M1 during what appears to be bath time. M1’s face
11 is partially visible, and M1 is grasping an adult white males partially erect
12 penis with M1’s right hand. The partially erect penis appears to have soap on
13 it and can be seen being held by the left hand of the adult male as well.
- 14 • Image file: 8a3e092c-8660-4df2-a669-b3b19848a4f9.jpg (Uploaded to Kik
15 by the SUBJECT USER on March 20, 2023, at 8:07:16 PM UTC Time) –
16 This image is of M1 on a bathroom floor sitting between the legs of a white
17 adult male. M1’s face is in frame, and M1’s genitalia are clearly visible. The
18 adult male can be seen with his hand resting across the chest of M1. The ring
19 finger of the adult male’s left hand resting across the M1’s chest has a dark-
20 colored, shiny ring on it which appears to be a wedding band.

21 8. IP connection information provided by Kik Messenger included two IP
22 addresses used by the SUBJECT USER to log into Kik Messenger and upload the files
23 described above. According to Lumen Technologies (formerly CenturyLink), both IP
24 addresses were assigned to GOODMAN’s residential internet service at the time they were
25 used to access and/or upload files to Kik Messenger.

1 9. A criminal history check revealed that in 2010, a California state court
2 convicted GOODMAN of multiple contact sex offenses involving minors and that he is a
3 registered sex offender.

4 10. I obtained a federal search warrant for GOODMAN's Jefferson County,
5 Washington, home and his person and led the law enforcement team in executing that
6 warrant on October 12, 2023.

7 11. At approximately 11:00 a.m. on October 12, I met with GOODMAN at the
8 Sheriff's Department in Jefferson County, Washington. Soon after I introduced myself,
9 GOODMAN grew agitated and appeared nervous. He noted that he had "been through this
10 before" five other times. After I read GOODMAN his Miranda rights, he asked for an
11 attorney.

12 12. I allowed GOODMAN to review the search warrant and the Attachment B,
13 and he grew very panicked. I left the room but was able to observe him leave his chair and
14 lay down on the ground in a prone position.

15 13. At approximately 11:20 a.m., law enforcement searched GOODMAN's
16 home and located the following:

- 17 • A bathroom that appears to be the same as the one pictured in the photos
18 uploaded by the SUBJECT USER.
- 19 • A smartphone matching the description and model number identified by Kik
20 Messenger as the device used by the SUBJECT USER to upload the above-
21 described images.

22 14. That same day, law enforcement interviewed M1's mother. M1's mother
23 identified M1 as the child depicted in the above-described images uploaded by the
24 SUBJECT USER. She also confirmed the location of the photos as a bathroom in
25 GOODMAN's Jefferson County, Washington, home. M1's mother also identified the ring
26 on the adult male hand that is visible in one of the photos described above as GOODMAN's
27


1 engagement ring. Finally, M1's mother confirmed that GOODMAN has had frequent,
2 unsupervised access to M1, including responsibility for bathing M1.

3 **CONCLUSION**

4 15. Based on the above facts, I respectfully submit that there is probable cause
5 to believe that MATAN L. GOODMAN, committed the offense(s) charged in this
6 Complaint.

7 DANIEL A
8 ORLANDO
9  Digitally signed by
DANIEL A ORLANDO
Date: 2023.10.12 17:17:31
-07'00'
10 DANIEL A. ORLANDO, Affiant
Special Agent, HSI

11 The above-named agent provided a sworn statement attesting to the truth of the
12 contents of the foregoing affidavit on this 13th day of October, 2023.

13
14 
15
16 The Honorable Theresa L. Fricke
United States Magistrate Judge